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COMPANY

## INTEROFFICE MEMORANDUM

DATE: December 1, 1999

TO: M. J. Jennings, K-H, Bldg 130, X2297

FROM: S. M. Nesta, K-H/ESS, T130C, X6386 *SM Nesta*

SUBJECT: NEPA DETERMINATION FOR FY00 NON-RADIOACTIVE WASTE  
CHEMICAL PROGRAM - SMN-159-99

I have reviewed the project to manage and dispose of waste chemicals, including non-radioactive and low level wastes, and hazardous and non-hazardous wastes during FY00. I understand that the program specifically intends to evaluate, repack, and otherwise manage 1,079 drums of legacy waste chemicals, with repacking operations to be conducted at Tent 11. Waste chemicals generated at other locations throughout the Site will also be managed through the program.

The checklist indicates that no pollution prevention measures have been considered. The following measures, if not already adopted, should be considered by the project:

- 1) Consolidate like waste types to minimize the number of drums,
- 2) Perform additional sampling and analysis to down-grade waste to lower waste types when feasible, and
- 3) Plan repack activities to minimize secondary waste.

No other environmental compliance issues have been raised at this time.

With regard to NEPA documentation, I find that improvements to prepare Tent 11 for waste management activities are covered by RFFO/CX 06-99, which was previously approved. New waste management activities, as stated in the project description, are considered to be routine functions at the Site and are covered by the 1980 Site EIS. No further NEPA review or documentation of the project is necessary and, from a NEPA perspective, the project may proceed.

If the scope of the project changes, please contact me so that we can review the changes for NEPA compliance. If you have any questions or need additional information regarding the above comments and determination, please call me at X6386.

cc:

Karan North, K-H  
Ted Hopkins, RMRS  
file

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